

## Exhibit C

1 COOLEY LLP  
BOBBY GHAJAR (198719)  
2 (bghajar@cooley.com)  
COLETTE GHAZARIAN (322235)  
3 (cghazarian@cooley.com)  
1333 2nd Street, Suite 400  
4 Santa Monica, California 90401  
Telephone: (310) 883-6400  
5 MARK WEINSTEIN (193043)  
(mweinstein@cooley.com)  
6 KATHLEEN HARTNETT (314267)  
(khartnett@cooley.com)  
7 JUDD LAUTER (290945)  
(jlauter@cooley.com)  
8 ELIZABETH L. STAMESHKIN (260865)  
(lstameshkin@cooley.com)  
9 3175 Hanover Street  
Palo Alto, CA 94304-1130  
10 Telephone: (650) 843-5000  
11 LEX LUMINA PLLC  
MARK A. LEMLEY (155830)  
12 (mlemley@lex-lumina.com)  
745 Fifth Avenue, Suite 500  
13 New York, NY 10151  
Telephone: (646) 898-2055  
14 CLEARY GOTTlieb STEEN & HAMILTON LLP  
ANGELA L. DUNNING (212047)  
15 (adunning@cgsh.com)  
1841 Page Mill Road, Suite 250  
16 Palo Alto, CA 94304  
Telephone: (650) 815-4131  
17

18 *Counsel for Defendant Meta Platforms, Inc.*

19 **UNITED STATES DISTRICT COURT**  
20 **NORTHERN DISTRICT OF CALIFORNIA**  
21 **SAN FRANCISCO DIVISION**

22 RICHARD KADREY, *et al.*,  
23 Individual and Representative Plaintiffs,  
24 v.  
25 META PLATFORMS, INC., a Delaware  
corporation;  
26 Defendant.  
27

Case No. 3:23-cv-03417-VC

**DEFENDANT META PLATFORMS, INC.'S  
OBJECTIONS AND RESPONSES TO  
PLAINTIFFS' CORRECTED SECOND SET OF  
REQUESTS FOR PRODUCTION**

Trial Date: None  
Date Action Filed: July 7, 2023

**RESPONSE TO REQUEST NO. 63:**

Meta incorporates by reference its objections and definitions above. Any electronic communications, including email and documents attached thereto, will only be produced pursuant to and in accordance with the ESI Order.

Meta objects to this Request because, on its face, it seeks and does not exclude documents and communications exchanged with or at the direction of Meta's attorneys concerning legal advice or opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such documents will not be produced.

Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the needs of the case to the extent it seeks all documents and communications from or to Mr. Dettmers concerning the subject matter of the Request, including documents with limited, if any, relevance to Plaintiffs' copyright infringement allegations and Meta's defenses thereto.

Meta objects to this Request to the extent it seeks information that is not relevant to any party's claims or defenses, in particular as Mr. Dettmers was uninvolved in the development or training of the Meta Language Models (as construed above).

**REQUEST FOR PRODUCTION NO. 64:**

Documents and Communications sufficient to show each instance within the last three years where You have licensed copyrighted works for Meta's commercial use.

**RESPONSE TO REQUEST NO. 64:**

Meta incorporates by reference its objections and definitions above. Any electronic communications, including email and documents attached thereto, will only be produced pursuant to and in accordance with the ESI Order.

Meta objects to this Request because, on its face, it does not exclude documents and communications exchanged with or at the direction of Meta's attorneys concerning legal advice or opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such documents will not be produced.

Meta objects to the phrase "commercial use" as vague, ambiguous, and undefined.

Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the

needs of the case because it seeks documents with limited, if any, relevance to Plaintiffs' copyright infringement allegations and Meta's defenses thereto. In particular, the Request appears to seek documents relating to Meta's licensing of third party materials for any purpose, irrespective of any connection to the development or training of the Meta Language Models (as construed above).

Meta objects to this Request to the extent it seeks information that is not relevant to any party's claims or defenses.

**REQUEST FOR PRODUCTION NO. 65:**

Documents and Communications sufficient to show each instance within the last five years where You have alleged a claim of copyright infringement against another.

**RESPONSE TO REQUEST NO. 65:**

Meta incorporates by reference its objections and definitions above. Any electronic communications, including email and documents attached thereto, will only be produced pursuant to and in accordance with the ESI Order.

Meta objects to this Request because, on its face, it does not exclude documents and communications exchanged with or at the direction of Meta's attorneys concerning legal advice or opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such documents will not be produced.

Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the needs of the case because it seeks documents with limited, if any, relevance to Plaintiffs' copyright infringement allegations and Meta's defenses thereto. Further, on its face, it is not limited to claims in the United States.

Meta objects to this Request to the extent it seeks information that is not relevant to any party's claims or defenses. Copyright infringement is a fact-specific inquiry; any claims Meta may have asserted turn on the facts of those cases and are not relevant to the claim asserted here, which is limited to a claim based on the alleged copying of Plaintiffs' registered works for training the Meta Language Models (as construed above).